

UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

In re:)	Case No. 24-00935-eg
)	Chapter 11
Partners In Hope, Inc.)	
)	
Debtor-in-Possession.)	
_____)	

DECLARATION OF ERIC W. KAUP

Comes Eric W. Kaup and hereby verifies under the penalty of perjury that the following is true and correct to the best of his knowledge, information and belief:¹

1. I am the Executive Vice President, Chief Commercial Officer, and Special Counsel of Hilco Trading, LLC, the Managing Member of Hilco Real Estate, LLC (“Hilco”) whose offices are located at 5 Revere Drive, Suite 206, Northbrook, Illinois 60062.

2. The professional services that Hilco shall render in this matter are real estate consulting and advisory services and to market and sell certain real property as set forth in the Real Estate Consulting and Advisory Services Agreement attached to the employment application (the “Agreement”).

3. If Hilco’s employment is approved in this matter, Hilco shall be paid pursuant to the terms and conditions, and at the times specified in, the Agreement .

4. Hilco is well-suited to undertake the engagement contemplated by the Agreement. Hilco is a diversified real estate consulting and advisory firm that evaluates, restructures, facilitates the acquisition of, and disposes of all types of real estate both nationally and internationally. Hilco has extensive experience solving complex real estate problems. Hilco has

¹ Certain information set forth herein relates to matters (i) contained in Hilco’s or its affiliates’ books and records and (ii) within the knowledge of other employees of Hilco or its affiliates, and is based on information provided by such employees.

an excellent reputation as a leader in the real estate field and has an experienced team of real estate brokers and analysts. Hilco's disposition and auction team has worked with numerous clients in the accelerated sale of challenging properties nationwide and to monetize hard-to-sell assets.

5. Hilco has performed no prior services for the Debtor; therefore has no pre-petition or post-petition claims against the Debtor.

6. In the ordinary course of its business, Hilco and its affiliates maintain a database for purposes of performing "conflicts checks." The database contains information regarding Hilco and its affiliates present and past representations and transactions. Hilco obtained a list of certain of the Debtor's creditors and other parties in interest in the above-captioned case as identified on **Schedule 1** attached hereto ("Potential Parties in Interest") from Debtor's counsel for purposes of searching the aforementioned database and determining the connection(s) which Hilco or its affiliates has with such entities.

7. Hilco searched the aforementioned database for the Potential Parties in Interest. Except as set forth on **Schedule 2** attached hereto, this inquiry revealed that none of the Potential Parties-in-Interest has a connection to Hilco or its affiliates.

8. To the best of my knowledge, information and belief, Hilco has no adverse interests to the Debtor or the bankruptcy estate or any creditors or parties-in-interest and their respective attorneys in any matter to which Hilco would be engaged. Hilco has no connection or affiliation with the United States Trustee or any employees of the United States Trustee's office. Further, Hilco would be considered a disinterested person as defined under Section 101(14) and Rule 2014 of the Bankruptcy Code.



Eric W. Kaup, Executive Vice President,
Chief Commercial Officer, and Special Counsel of
Hilco Trading, LLC, the Managing Member of
Hilco Real Estate, LLC

Date: June 19, 2024

Schedule 1

Potential Parties in Interest

Label Matrix for local noticing
0420-2
Case 24-00935-eg
District of South Carolina
Charleston
Wed May 29 18:06:34 EDT 2024

Ally Bank Lease Trust - Assignor to Vehicle
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Ally Bank, c/o AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Partners In Hope, Inc.
260 Watson Heritage Road
Loris, SC 29569-6766

Robert E. Lee, LLC
P.O. Box 1096
Marion, SC 29571-1096

J. Bratton Davis United States
Bankruptcy Courthouse
1100 Laurel Street
Columbia, SC 29201-2423

Anthony Hearl, LLC
6199 Flossie Rd.
Conway SC 29527-7616

Capture Cares Assisted Living LLC
260 Watson Heritage Rd
Loris SC 29569-6766

Clara Elizabeth Weston
PO Box 11449
Columbia, SC 29211-1449

Coastal Sanitary Supply Co.
PO Box 12490
Florence SC 29504-2490

Coastal Senior Solutions, LLC
609 17th Ave N.
Myrtle Beach SC 29577-3504

David Richard Sligh
1303 Third Ave.
Conway SC 29526-5001

Davis Jaren Andrew Diethrich
40 Calhoun St. Ste. 400
Charleston SC 29401-3531

George E. Graham
PO Box 915
Conway SC 29528-0915

Hill & Jordan, CPAs, LLC
121 North Fifth Street.
Hartsville SC 29550-4139

Horry Electric Cooperative Inc.
PO Box 119
Conway SC 29528-0119

Internal Revenue Service
PO Box 7346
Philadelphia PA 19101-7346

J. David Banner
PO Drawer 1931
Florence SC 29503-1931

John C. Thomas
107 Lewis St
Conway SC 29526-5204

Jonathan Patrick Hanna
PO Box 2810
Murrells Inlet SC 29576-2664

Joseph Kershaw Spong
PO Box 11449
Columbia, SC 29211-1449

Kathleen Spencer Craig Gill
111 Coleman Boulevard Suite 301
Mt. Pleasant SC 29464-5662

Kenneth Ray Moss
628A Sea Mountain Highway
North Myrtle Beach SC 29582-2497

LEAF Capital Funding, LLC -100-7137351-001-
2005 Market Street 14th FL
Philadelphia PA 19103-7009

Leverage Builders, LLC
d/b/a Leverage Roofing
3401 Hwy 17 Business S.
Murrells Inlet SC 29576-7775

M. Timothy Hucks, PA
609 17th Ave N.
Myrtle Beach SC 29577-3504

McLean Enterprises, LLC
4350 Spring Street
Loris SC 29569-2224

Performance Foodservice Company
2801 Alex Lee Blvd
Florence, ScC 29506-8250

Robert Julian Thomas, Jr.
300A Outlet Pointe Blvd
Columbia, SC 29210-5666

(p) SC DEPARTMENT OF EMPLOYMENT AND WORKFORCE
PO BOX 8597
COLUMBIA SC 29202-8597

Sean B. ODonovan
3414 Peachtree Rd NE, Suite 1500
Atlanta, GA 30326-1114

South Carolina Department of Revenue
Office of General Counsel
Attn: Bankruptcy Department
300A Outlet Pointe Blvd.
Columbia SC 29210-5666

Steven A Jordan, Jr.
PO Box 8597
Columbia SC 29202-8597

Thomas Augustine Dausey Barrow
111 Coleman Blvd. Suite 301
Mt. Pleasant SC 29464-5662

(p)USDA FARM SERVICE AGENCY
ATTN FARM LOANS
1927 THURMOND MALL
SUITE 100
COLUMBIA SC 29201-2387

Valerie Michelle McMellan
S.C. Dept Of Employment & Workforce
PO Box 8597
COLUMBIA SC 29202-8597

West Town Bank & Trust
7820 West 26th Street
North Riverside IL 60546-1599

West Town Bank & Trust f/k/a West Town Savin
Attn: Michael T. Crawford
8450 Falls of Neuse Road, Suite 202
Raleigh, NC 27615-3549

Jane H. Downey
Baker Donelson
1501 Main St
Ste 310
Columbia, SC 29201-2881

US Trustee's Office
Strom Thurmond Federal Building
1835 Assembly St.
Suite 953
Columbia, SC 29201-2448

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

SC Department of Employment & Workforce
PO Box 995
Columbia SC 29202

USDA
215 Third Loop Road, Suite 100
Florence SC 29505

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)West Town Bank & Trust f/k/a West Town Sav

(d)Capture Cares Assisted Living, LLC
260 Watson Heritage Road
Loris SC 29569-6766

(d)Robert E. Lee
P.O. Box 1096
Marion SC 29571-1096

End of Label Matrix
Mailable recipients 39
Bypassed recipients 3
Total 42

Schedule 2

Disclosures

Schedule 2
Disclosures
Partners In Hope, Inc.

- a. In matters unrelated to the Debtor, affiliates of Hilco have provided business advisory, real estate appraisal and/or asset valuation services to (i) Ally Bank, and (ii) the Internal Revenue Service.
- b. It is possible that Hilco may represent or may have represented other creditors or parties in interest of the Debtor but does not represent any such parties in connection with this case. Hilco presently or in the past has served as a professional person in other matters, wholly unrelated to the Debtor or this case, in which other attorneys, accountants and other professionals of the Debtor, creditors, or other parties in interest may have also served or serve as professional persons.